

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO 3:22-cr-00274
	)	
Plaintiff,	)	JUDGE JAMES R. KNEPP II
	)	
v.	)	
	)	<u>NOTICE OF INTENT TO INTRODUCE</u>
	)	<u>EXPERT TESTIMONY OF FORENSIC</u>
	)	<u>CHEMIST REBECCA JONES</u>
	)	
AMANDA HOVANEC,	)	
ANTHONY THEODOROU,	)	
	)	
Defendants.	)	

Now comes the United States of America, by and through its attorneys, Michelle M. Baeppler and Alissa M. Sterling, and pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure and submit that the United States intends to introduce the expert testimony of Drug Enforcement Administration (DEA) forensic chemist Rebecca Jones at trial. Ms. Jones' opinions and qualifications regarding forensic chemistry are contained in the DEA Certification and supporting documentation for an etorphine standard. These documents were previously provided to the defense in discovery.

**Complete Statement of Opinions**

Specifically, Ms. Jones will provide testimony regarding receipt of an etorphine sample from the Toledo Zoo. Ms. Jones will explain the processes used to test the etorphine sample from the Toledo Zoo. More specifically, Ms. Jones will testify regarding NMR testing, GCFID testing, and GCMS testing that the sample of etorphine from the Toledo Zoo underwent. She will explain that the results of these three tests were then compared to known reference data for the identification of drugs, and that the sample provided from the Toledo Zoo was in fact

etorphine. Ms. Jones will further explain the peer review that the etorphine sample underwent before the formal certification was issued.

Ms. Jones will also explain that once the sample was established through testing as a known standard of etorphine, it was then sent with an accompanying certification to the FBI Laboratory in Quantico, for further use as a comparison standard.

**Basis and Reasons for those Opinions**

In support of these opinions, Ms. Jones will explain the processes and use of NMR, GCFID and GCMS testing on the etorphine sample provided by the Toledo Zoo.

Ms. Jones' opinions are more fully set forth in the DEA Certification for Etorphine dated May 19, 2022, and the supporting documentation that was provided in discovery and is hereby incorporated by reference, as well as her training, education, knowledge, experience, and expertise as a forensic chemist.

Finally, the documents referenced herein are not an exhaustive or complete recitation of testimony that Ms. Jones may offer. In addition, she may offer opinions in response to questions posed during trial.

**Qualifications**

Ms. Jones is a forensic chemist for the DEA. She has been with the DEA since 2003. She holds a Bachelor of Science degree in Chemistry from Providence College. She has received additional training as described in the attached Curriculum Vitae.

Ms. Jones has not testified within the last four years, nor authored any publications in the last 10 years.

A copy of Ms. Jones' Curriculum Vitae is attached as Exhibit 1.

Pursuant to Fed. R. Crim. P. 16(a)(1)(G)(v), I approve the foregoing disclosure.

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Rebecca Jones  
Forensic Chemist  
Drug Enforcement Administration

The United States hereby requests reciprocal expert disclosure from the defense, pursuant to Fed. R. Crim. P. 16(b)(1)(C).

Respectfully submitted,

REBECCA C. LUTZKO  
United States Attorney

By: /s/ Michelle M. Baeppler  
Michelle M. Baeppler (0065378)  
Assistant U.S. Attorney  
United States Court House  
801 West Superior Avenue, Suite 400  
Cleveland, Ohio 44113-1852  
(216) 622-3995  
Michelle.Baeppler@usdoj.gov

By: /s/ Alissa M. Sterling  
Alissa M. Sterling (0070056)  
Assistant U.S. Attorney  
Four SeaGate, Suite 308  
Toledo, Ohio 43604  
(419) 259-6376  
Alissa.Sterling@usdoj.gov